

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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WALTER ELAM,

15 CV 7215

Plaintiff,

v.

CONCOURSE VILLAGE, INC., ANTHONY JAMES,
individually, and LETITIA BOWRY, individually,

**DECLARATION OF
WALKER G. HARMAN, JR.**

Defendants.
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Walker G. Harman, Jr., an attorney admitted to practice in the United States District Court of the Southern District of New York, declare under penalty of perjury:

1. I am an attorney of record for Plaintiff and commenced this action on his behalf. This Declaration is based upon my personal knowledge of the facts contained herein, as well as my knowledge as Plaintiff's attorney.

2. I submit this Declaration in opposition to Defendants' Motion for Summary Judgment in the above-captioned case.

3. A true and correct copy of emails from Sherill Henry (Bates numbered D000181–D000182) is annexed hereto as Ex. O.

4. A true and correct copy of Duties and Responsibility of a Stock Room Supervisor dated November 3, 2009 (Bates numbered D000125) is annexed hereto as Ex. P.

5. A true and correct copy of Duties and Responsibility of a Stock Room Supervisor, dated March 13, 2009 (Bates numbered D000152) is annexed hereto as Ex. Q.

6. A true and correct copy of Performance Review dated September 8, 2015 (Bates numbered D000158–D000159) is annexed hereto as Ex. R.

7. A true and correct copy of Christina Verney's Notes (Bates numbered D000188–D000189) is annexed hereto as Ex. S.

8. A true and correct copy of a Meeting Transcript (Bates Numbered D000729) is annexed hereto as Ex. T.

9. A true and correct copy of select portions of Walter Elam's Deposition is annexed hereto as Ex. U.

10. A true and correct copy of select portions of Anthony James's Deposition is annexed hereto.

11. A true and correct copy of select portions of Sherill Henry's Deposition is annexed hereto.

12. A true and correct copy of select portions of Leticia Bowry's Deposition is annexed hereto.

13. A true and correct copy of select portions of Christina Verney's Deposition is annexed hereto.

14. I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
October 14, 2016

By: s/ Walker G. Harman, Jr.
Walker G. Harman, Jr.